

GOLDBERGER & DUBIN, P.C.

ATTORNEYS AT LAW
401 BROADWAY, STE 306, NEW YORK, NY 10013
(212) 431-9380
www.goldbergerdubin.com

PAUL A. GOLDBERGER*
LAWRENCE A. DUBIN*§
EDGAR L. FANKBONNER*

* MEMBER OF NY BAR
§ MEMBER OF NJ BAR

August 10, 2023

Via ECF

Hon. LaShann DeArcy Hall
United States District Court
For the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Fan Liu*
Docket No. 22-cr-311 (LDH)

Dear Judge DeArcy Hall:

I represent defendant Fan Liu in his criminal matter before this Court. I am writing to request a modification of Mr. Liu's conditions of release. The Court previously granted Mr. Liu's request to modify his conditions of release so he could attend his father's funeral at Plainview Kensico Cemetery in Valhalla, New York, which is located within the Township of Mount Pleasant, New York in Westchester County.

Mr. Liu now respectfully requests that the Court authorize him to travel to and from the aforementioned location on August 18 and 19, the dates of August Moon Festival, so that he may sweep his father's grave, in accordance with Chinese tradition.

Mr. Liu further requests that the Court authorize him to travel to Baltimore, Maryland on August 20 and 21 to drive his daughter at Johns Hopkins University, where she will be starting her freshman year.

The government consents to this request.

Respectfully submitted,

/s/ Edgar Loy Fankbonner
Edgar Loy Fankbonner
Attorney for Petitioner